



DEPARTMENT OF MEDICINE

SCHOOL OF MEDICINE
SAN FERNANDO VALLEY PROGRAM
OLIVE VIEW - MEDICAL CENTER
14445 OLIVE VIEW DRIVE
SYLMAR, CALIFORNIA 91342-1495

October 18, 1999

Docknet Management Branch (HA-305)
Attn: Docket No. 97N-0023
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, M.D. 20852**Re: Proposal for Transition Away from
CFC-Containing MDIs**

I have been made aware of the September, 1999 NPR regarding CFC-containing MDIs. I believe that it is essential that many in the broad-spectrum of patients of varying disabilities and abilities be offered the assurance of the MDIs that they have become used to. Patients cannot readily adapt from one form of customary treatment to another, and their compliance difficulties could adversely affect their health.

I have had over 30 years of experience in treating respiratory patients, and I am convinced that without access to the current MDIs, a significant proportion of these people could not attain the desired therapeutic effect. Alternative forms of treatment that are readily accepted as initial therapy can be difficult to introduce as replacement therapy. Too many vulnerable patients would be affected by an unplanned switch in delivery device under the best of circumstances. In today's environment, all too many of these patients cannot obtain sufficient time with their doctors or other health care professionals to master the use of a new technique. Under these stressful circumstances, it is essential not to "rock the boat" for patients whose health is dependent on their ability to use MDIs.

I welcome the NPR's provisions, since they will assure minimal disruption in patient care for the treatment of asthma and other obstructive airway diseases.

Sincerely,

A handwritten signature in cursive script that reads "Irwin Ziment MD".

Irwin Ziment, M.D.
Professor & Chief of Medicine
Olive View-UCLA Medical Center
UCLA School of Medicine

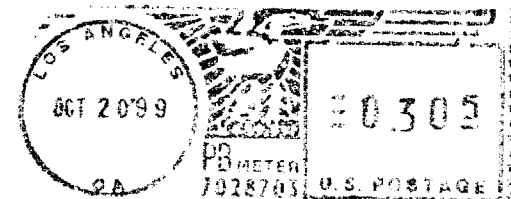
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